

**GIBSON DUNN**

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June 9, 2025

VIA ECF

Hon. Lorna G. Schofield  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Binh Thanh Import Export Prod. & Trade Joint Stock Co. v. Amazon.com Servs. LLC*,  
Case No. 1:23-cv-00292 (S.D.N.Y.)

Dear Judge Schofield:

I represent Defendant Amazon.com Services LLC (“Amazon”) in the above-referenced action. Pursuant to Your Honor’s Individual Rule for Civil Cases I.D.3, and for the reasons set forth below, Amazon respectfully moves the Court to treat as sealed Exhibits 3-A, 3-C, 4-A, 4-C, 4-E, and 7 to Amazon’s pre-motion letter regarding its anticipated motion for sanctions, pending designation by Plaintiff Binh Thanh Import Export Production & Trade Joint Stock Co., d/b/a Gilimex, Inc. (“Gilimex”).

These exhibits have been designated as Confidential by Gilimex, or otherwise contain information that Gilimex has designated as Confidential, pursuant to the February 21, 2023 Stipulation and Confidentiality Order (the “Confidentiality Order”). *See* Dkt. 25. Amazon takes no position as to whether any of the above information should remain under seal. However, given the existence of these confidentiality designations under the Confidentiality Order, Amazon has filed these exhibits under seal. Amazon has taken this approach out of an abundance of caution and to give Gilimex an opportunity to designate which portions of those documents Gilimex wishes to keep under seal, if any, and to provide the reasons for such continued treatment consistent with Your Honor’s Individual Rule for Civil Cases I.D.3.

Respectfully submitted,

/s/ Jordan Estes

Barry H. Berke  
Jordan Estes  
Andrew LeGrand  
Grace E. Hart  
Daniel M. Ketani

cc: All counsel of record (by ECF)

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## Appendix

Pursuant to Your Honor's Individual Rule I.D.3, included below is a list of all parties and attorneys of record who should have access to the sealed documents:

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